

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

**B.P., H.A., and S.H., individually, and on
behalf of all other similarly situated,**

Plaintiffs,

v.

City of Johnson City, Tennessee, et al.,

Defendants.

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]No: 2:23-cv-00071-TRM-JEM

**DECLARATION OF MAJOR ERIC DOUGHERTY IN SUPPORT OF DEFENDANTS'
REPLY TO PLAINTIFFS' RESPONSE TO MOTION FOR A PROTECTIVE ORDER**

Pursuant to 28 U.S.C. § 1746, I, Eric Dougherty, certify under penalty of perjury that the foregoing is true and correct:

1. I am over eighteen (18) years of age and am competent in all respects to give this Declaration. This declaration is based upon my personal knowledge.


2. I am currently employed by the Johnson City Police Department as the Major of Operations. I have been employed by the Johnson City Police Department since September of 1993. I have been the Major of Operations for the Johnson City Police Department since May of 2023.

3. Mike Street was hired by the Johnson City Police Department in October of 1978 and retired from the Johnson City Police Department on or about March 31, 2017. During his employment with the Johnson City Police Department, Mr. Street was never assigned to the DEA as a task force officer (hereinafter, "TFO").

4. Captain Mike Adams is currently a captain for the Johnson City Police Department. Captain Adams was hired by the Johnson City Police Department in September of 2001. During his employment with the Johnson City Police Department, Captain Adams has never been assigned to the DEA as a TFO.

5. Lt. David Hilton is currently a lieutenant for the Johnson City Police Department. Lt. Hilton was hired by the Johnson City Police Department in July of 2002. During his employment with the Johnson City Police Department, Lt. Hilton has never been assigned to the DEA as a TFO.

6. The Johnson City Police Department has not had a DEA TFO since August of 2019.
Executed on this 19th day of September, 2024.


MAJOR ERIC DOUGHERTY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system:

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Dated this 19^h day of September, 2024.

s/Emily C. Taylor, BPR No. 27157
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